

October 23, 2020

**VIA ELECTRONIC MAIL**

Luly E. Massaro, Commission Clerk  
Rhode Island Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, RI 02888

**RE: Docket 5073 - Retail Energy Supply Association Petition for Implementation of  
Purchas of Receivables  
National Grid's Motion of Intervention**

Dear Ms. Massaro:

Enclosed is National Grid's<sup>1</sup> Motion of Intervention in the above-referenced docket.<sup>2</sup>

Thank you for your attention to this matter. If you have any questions, please contact me at 401-784-4263.

Very truly yours,



Andrew S. Marcaccio

Enclosure

cc: Docket 5073 Service List  
John Harrington, Esq.  
Christy Hetherington, Esq.  
John Bell, Division

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<sup>1</sup> The Narragansett Electric Company d/b/a National Grid (National Grid or Company).

<sup>2</sup> Per Commission counsel's update on October 2, 2020, concerning the COVID-19 emergency period, the Company is submitting an electronic version of this filing. The Company will provide the Commission Clerk with five (5) hard copies of the enclosures.

**IN RE: RETAIL ENERGY SUPPLY :  
ASSOCIATION (RESA) - PETITION : DOCKET NO. 5073  
FOR IMPLEMENTATION OF :  
PURCHASE OF RECEIVABLES PROGRAM :**

The Narragansett Electric Company d/b/a National Grid (“National Grid” or the “Company”) hereby respectfully requests that the Public Utilities Commission (“Commission”) grant the Company’s intervention in the above referenced docket pursuant to 810-RICR-00-00-1.14. The reasons for intervention are set forth in this motion to intervene (this “Motion”). In accordance with 810-RICR-00-00-1.16(B) and based on a pre-conference that occurred on October 7, 2020, it is the Company’s belief that this Motion will not be opposed.

1. On or around September 16, 2020, the Retail Energy Supply Association (“RESA”) filed a petition with the Commission, pursuant to 810-RICR-00-00-1.11, seeking implementation of a purchase of receivables (“POR”) program in Rhode Island.
2. The Commission established the above-referenced docket to review RESA’s petition. On October 7, 2020, the Commission held a pre-conference and set an October 27, 2020 deadline for interventions in this proceeding. At the pre-conference, RESA and the Division of Public Utilities and Carriers (“Division”) indicated that they would not oppose this Motion.

3. In accordance with R.I. Gen. Laws § 39-1-27.13, the Commission “may implement a purchase of receivables program where the electric distribution company purchases the receivables of a nonregulated power producer at a discount rate that is then offset from the monthly payments the electric distribution company makes to the nonregulated power producer if the commission finds that the benefits of the program to ratepayers would exceed the costs to ratepayers.”
4. National Grid is an electric distribution company within Rhode Island.
5. If a POR program is implemented as a result of these proceedings, the Company may be authorized and/or directed to purchase the receivables of nonregulated power producers.

#### **LEGAL STANDARD**

6. Intervention in Commission proceedings is governed by 810-RICR-00-00-1.14 which provides that “any person claiming a right to intervene or an interest of such nature that intervention is necessary or appropriate may intervene in any proceeding before the Commission.” See 810-RICR-00-00-1.14(B).
7. It is appropriate for the Commission to grant a motion to intervene when (1) the right of intervention is conferred by statute; (2) a movant may be bound and its interests may be directly affected by the proceedings, and those interests are not adequately represented by existing parties; or (3) the movant holds an interest of such nature that the movant's participation may be in the public interest. See 810-RICR-00-00-1.14(B)(1) through (3).

### **ARGUMENT**

8. The Company's intervention in the above-referenced docket is necessary and appropriate and the Company's participation may be in the public interest.
9. The Company's interests may be directly affected by these proceedings, and those interests are not adequately represented by existing parties.
10. National Grid is seeking intervention pursuant to 810-RICR-00-00-1.14(B)(2) and B(3). If a POR program is implemented as a result of these proceedings, the Company may be authorized and/or directed to purchase the receivables of nonregulated power producers. This could impact the Company's administrative and financial resources, create financial risk for the Company and require changes to the Company's billing and financial systems. This could also impact certain regulatory mechanisms such as the setting of the energy supply administrative cost factor. Accordingly, National Grid's interests may be directly affected by these proceedings.

### **CONCLUSION**

For all of the foregoing reasons, National Grid hereby respectfully requests that the Commission grant its motion to intervene in this proceeding as a full party.

**WHEREFORE**, the Company respectfully requests that the Commission grant its Motion to Intervene as stated herein.

[SIGNATURE PAGE FOLLOWING]

Respectfully submitted,

**NATIONAL GRID**

By its attorney,

A handwritten signature in blue ink, appearing to read "Andrew S. Marcaccio".

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Andrew S. Marcaccio (RI Bar #8168)  
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(401) 784-4263  
[Andrew.Marcaccio@nationalgrid.com](mailto:Andrew.Marcaccio@nationalgrid.com)

Dated: October 23, 2020

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate was electronically transmitted to the individuals listed below.



\_\_\_\_\_  
Joanne M. Scanlon

October 23, 2020

Date

**Docket No. 4514 – National Grid –2014 Annual Distribution Adjustment  
Charge Filing (“DAC”) - Service List as of 8/27/14**

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